

REMARKS

The Office Action dated January 18, 2006, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-16 are currently pending in the application, of which claims 1, 6, and 13 are independent claims. Claims 1, 6, and 13 have been amended to more particularly point out and distinctly claim the invention. No new matter has been added. Claims 1-16 are respectfully submitted for consideration.

Claims 1-16 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,717,516 of Bridgelall (“Bridgelall”). Applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-5 depend, is directed to a radio equipment system having a modular structure. The system includes a baseband modem, a digital interface, and a radio frequency unit including digitally operating radio frequency control means and radio frequency parts means. The baseband modem and the radio frequency unit respectively form physically separate modules which are connected with each other by the digital interface.

Claim 6, upon which claims 7-12 depend, is directed to a method of running a radio equipment. The method includes providing a radio equipment comprising physically separate modules of a baseband modem and a radio frequency unit including digitally operating radio frequency control means and radio frequency parts means. The

method also includes providing a digital interface for connection of the baseband modem module and the radio frequency unit module with each other within the radio equipment.

Claim 13, upon which claims 14-16 depend, is directed to a digital interface for connecting a baseband modem module with a radio frequency unit module including digitally operating radio frequency control means and radio frequency part means within a radio equipment. The baseband modem module and the radio frequency unit module are physically separated. The interface is configured to perform the signal exchange between the modules.

Certain embodiments of the present invention can provide the advantage that the baseband modem module and the RF unit module can be developed very independently of each other. Because a split is effected from a functional point of view, developers for one module need to know very few things about a detailed implementation of the other module.

Applicants respectfully submit that Bridgelall fails to disclose or suggest all of the elements of any of the presently pending claims, and therefore cannot provide the critical and unobvious advantages described above.

Bridgelall generally relates to hybrid Bluetooth/RFID based real time location tracking. As explained at column 1, lines 35-44, Bridgelall aims to provide an improvement in locating items that have active or passive back scatter RFID tags. Bridgelall, at column 5, lines 1-15, describes that a fixed device 12 may include an RF

module 34 having an antenna 36. A Bluetooth radio interface 42 couples the RF module 34 to a Bluetooth baseband modem 46.

Claims 1, 6, and 13 each recite: “wherein the baseband modem and the radio frequency unit respectively form physically separate modules” (claim 1), “a radio equipment comprising physically separate modules of a baseband modem and a radio frequency unit” (claim 6), “wherein the baseband modem module and the radio frequency unit module are physically separated” (claim 13). Applicants respectfully submit that Bridgelall does not disclose or suggest at least these features of the claimed invention.

The Office Action took the position that these features are taught in Figure 2 and column 5, lines 1-15 of Bridgelall. However, neither column 5, lines 1-15 nor Figure 2 disclose or suggest, “wherein the baseband modem and the radio frequency unit respectively form physically separate modules” (as recited in claim 1) or the other features described above.

The Office Action did not provide any analysis to support its conclusion of anticipation. Accordingly, Applicants treat the rejection as construing elements 38 and 34 as the claimed radio frequency unit and some element within box 54 as being the claimed baseband modem module. Although elements 38 and 34 are shown outside of box 58, an examination of the context of Figure 2 shows that elements 38 and 34 are not disclosed as physically separate from elements 44 and 42 respectively. For example, element 72 is shown in a separate from box 60, but would have to be physically connected in order to function, because element 72 is just flash memory. Applicants

respectfully submit that the connection between element 72 and box 60 is shown as similar to the connection between elements 34 and 42 and elements 38 and 44 respectively. Accordingly, one of ordinary skill in the art would not have interpreted Figure 2 or column 5, lines 1-15 as disclosing “wherein the baseband modem and the radio frequency unit respectively form physically separate modules” (as recited in claim 1) or the other features described above. Thus, it is respectfully requested that this rejection be withdrawn.

Additionally, Applicants submit that claims 1, 6, and 13 have been amended to further clarify that the radio control means are configured to be “digitally operating.” It is respectfully submitted that Bridgelall does not disclose or suggest at least this feature of the claims. Accordingly, for this additional reason, it is respectfully requested that this rejection be withdrawn.

Claims 2-5, 7-12, and 14-16 depend from claims 1, 6, and 13 respectively, and recite additional features. Accordingly, it is respectfully submitted that each of claims 2-5, 7-12, and 14-16 recites subject matter that is neither disclosed nor suggested in the cited reference. Therefore it is respectfully requested that the rejection of all of claims 1-16 be withdrawn.

For the reasons explained above, it is respectfully submitted that each of claims 1-16 recites subject matter that is neither disclosed nor suggested in the cited reference. Therefore, it is respectfully requested that all of claims 1-16 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,


Peter Flanagan
Registration No. 58,178

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800
Fax: 703-720-7802

PCF:kmp